

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

MIGUEL ANGEL CARDONA, in his official capacity as Secretary of Education, et al.,

Case No. 1:20-cv-11104

Defendants,

and

STATE OF TEXAS,

[Proposed] Intervenor-Defendant.

TEXAS' MOTION TO INTERVENE AS DEFENDANT

Putative Intervenor-Defendant, the State of Texas, by and through the Attorney General of Texas, and pursuant to Federal Rule of Civil Procedure 24, moves to intervene as of right in the above-captioned action or, in the alternative, permissively, for purposes of appeal. In support of this Motion, Texas relies on the following contemporaneously-filed documents:

1. Memorandum in Support of Texas' Motion to Intervene for Purposes of Appeal;
2. [Proposed] Intervenor-Defendant Texas' Answer; and
3. [Proposed] Order Granting Texas' Motion to Intervene for Purposes of Appeal.

For the reasons stated in this Motion and accompanying documents, Texas respectfully requests that the Court grant its Motion to Intervene.

Date: September 24, 2021.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

Respectfully submitted.

PATRICK K. SWEETEN
Associate Deputy for Special Litigation

/s/ *Kathleen T. Hunker*
KATHLEEN T. HUNKER
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CERTIFICATE OF SERVICE

I, Kenneth B. Walton, hereby certify that on September 24, 2021, a true and correct copy of the within document was served on all parties via the Electronic Case Filing System.

/s/ Kenneth B. Walton
Kenneth B. Walton